

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

FULLERTON CAPITAL PTE LTD.,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01004 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, by and through his counsel, Baker & Hostetler LLP, and defendant Fullerton Capital PTE Ltd. (“Fullerton”), by and through its counsel, Arnold & Porter LLP, hereby stipulate and agree as follows:

WHEREAS on January 5, 2012, the Trustee filed a complaint in the above-captioned adversary proceeding against Fullerton in this Bankruptcy Court (the “Court”), asserting bankruptcy law claims (the “Complaint”);

WHEREAS on April 2, 2012, Fullerton filed a motion to dismiss the Complaint in this action;

WHEREAS the parties to this stipulation reserve all rights and defenses the Trustee and Fullerton may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction;

IT IS HEREBY STIPULATED AND AGREED by and between the Trustee and Fullerton, by the endorsement of their counsel below, that:

1. The Trustee shall respond to Fullerton’s motion to dismiss the Complaint no later than June 1, 2015;
2. Fullerton’s reply to the Trustee’s response shall be filed and served no later than July 15, 2015; and
3. The Pre-Trial Conference shall be adjourned from May 20, 2015, to August 26, 2015, at 10:00 a.m.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 8762).

Dated: January 13, 2015  
New York, New York

By: /s/ David J. Sheehan  
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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

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